

Protocol for Forensic Examination of Array Devices

The purpose of this protocol (the “Protocol”) is to set out the provisions governing the imaging, searching for, and delivery, of documents, data, files, and other information obtained from Julio Garza’s devices.

- 1) The Forensic Vendor will be Pathway Forensics (“PATHWAY”)
- 2) The “Search Terms” referenced throughout are those terms on Exhibit 1 hereto;
- 3) The “File Names” referenced throughout are those file paths on Exhibit C to Plaintiff’s Original Petition;
- 4) To the extent that disputes arise with respect to carrying out the terms of this Protocol, the Parties shall meet and confer in an effort to resolve those disputes. The existence of one or more disputes shall not be grounds to change or defer the timetables set forth herein.
- 5) Array Cell Phone (“Array Phone”).
 - a. Garza has turned over his Array Phone to Array’s counsel and it remains in Array’s counsel’s possession. Array’s counsel will immediately turn over the Array Phone to Pathway.
 - b. PATHWAY will forensically image the Array Phone and conduct a search of the electronic files of the Array Phone using the Search Terms and the File Names on or before July 12, 2022.
 - c. PATHWAY will produce a file list and a copy of all files located during PATHWAY’s search of the Array Phone to Defendant’s counsel. Within two calendar days of receipt of the file list and the files, Defendant’s counsel and Array’s counsel will designate each file that is a Garza or Array file as Personal, Confidential or Highly Confidential – Attorney’s Eyes Only.
 - d. Within one calendar days from Defendant’s counsel’s designation, PATHWAY shall produce to NOV’s counsel a file list and a copy of all files, except copies of the files designated as Personal, PATHWAY located during PATHWAY’s search.
- 6) Array Technologies Issued Laptop (“Array Computer”).
 - a. Garza has turned over his Array Phone to Array’s counsel and it remains in Array’s counsel’s possession. Array’s counsel will immediately turn over the Array Phone to Pathway.
 - b. On or before July 12, 2022, PATHWAY will examine user activity artifacts (LNK files, Jump Lists, Shell Bags, UserAssist, MRU Records, etc.) on Garza’s Array

Computer to confirm whether the Subject Device was attached to the Array Computer after April 26, 2022.

- c. If PATHWAY does not determine from its examination in (a) that the Subject Device was attached to the Array Computer after April 26, 2022, then PATHWAY will conduct no further searches on the Array Computer.
- d. If PATHWAY determines from its examination in (a) that the Subject Device was attached to the Personal Computer after April 26, 2022, then PATHWAY will conduct a search of the user-created electronic files using the Search Terms and File Names on or before July 12, 2022.. PATHWAY will also produce a report of the connect/disconnect events for all devices plugged into the Array Computer.
- e. PATHWAY will produce a file list and a copy of all files located during PATHWAY's search of the Array Computer to Defendant's counsel and Array's counsel. Within two calendar days of receipt of the file list and the files, Defendant's counsel and Array's counsel will designate each file that is a Garza or Array file as Personal, Confidential or Highly Confidential – Attorney's Eyes Only.
- f. Within one calendar days from Defendant's counsel's and Array's counsel's designation, PATHWAY shall produce to NOV's counsel a file list and a copy of all files, except copies of the files designated as Personal or belonging to Array that PATHWAY located during PATHWAY's search.

7) Array Email Accounts.

- a. On or before June 29, 2022, PATHWAY will forensically preserve and conduct a search Garza's Array email account email for NOV documents using the Search Terms and the File Names.
- b. PATHWAY will produce a file list and a copy of all emails located during PATHWAY's search of the Array email account to Defendant's counsel. Within three calendar days of the search, Defendant's counsel will designate each file as Personal, Confidential, or Highly Confidential – Attorney's Eyes Only.
- c. Within two calendar days from Defendant's counsel's designation, PATHWAY shall produce to NOV's counsel a file list and a copy of all email, except copies of the emails designated as Personal, PATHWAY located during PATHWAY's search.

8) Nothing shall prevent PATHWAY from delivering examination results on a rolling basis.